

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 04-CR-10385-MEL
	)	
JEROME WEEKES	)	
	)	
	)	

**ASSENTED-TO MOTION TO EXTEND TIME**

The United States of America, with the assent of the defendant, moves to extend the time by which it must respond to defendant Jerome Weekes' ("Weekes") Motion for New Trial and Re-Sentencing until April 18, 2008. In support of its motion, the government states the following.

1. Weekes' motion is long, complicated and raises multiple difficult issues.

2. The undersigned Assistant U.S. Attorney only recently obtained Weekes' motion. Moreover, the government has, to-date, been unable to obtain a legible copy of one of the exhibits to the motion. (Defense counsel has agreed to send the government a hard copy of the document).

3. The undersigned Assistant U. S. Attorney has, for approximately the past year, been assigned to the Worcester branch office of the U.S. Attorney's Office, and has only just

recently returned to the Boston Office.

4. The undersigned Assistant U.S. Attorney has a scheduled (and paid for) family vacation scheduled during March 24,2008, through April 1,2008.

5. The additional time requested is necessary for the government to adequately respond to the motion.

6. The defendant assents to the motion.

7. The additional time requested will not prejudice the defendant. Weekes is currently serving a fifteen-year sentence of incarceration. (Even assuming, for the sake of argument, that his new trial motion were granted, Weekes would almost certainly be held pending trial given that he failed to appear for sentencing, violated his conditions of release, was in hiding for several months, and was apprehended in unlawful possession of firearms and false identity documents. Weekes also faces potential charges for bail jumping and for weapons possession and violations in the District of Georgia where he was apprehended).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/Christopher F. Bator  
Christopher F. Bator  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic filing upon all counsel of record.

/s/Christopher F. Bator  
Christopher F. Bator  
Assistant U.S. Attorney